

REMARKS

Claim 21 has been canceled without prejudice. Claims 15, 19, 22 and 27 have been amended. Claims 15-20 and 22-27 are currently pending.

Section 112

Claims 15, 19, 21 and 27 stand rejected under 35 USC 112, first paragraph. Even though Applicant does not agree with these rejections, to simplify the issues for examination, Applicant has:

1. amended claim 15 to delete the recitation of the "polygon";
2. canceled claim 21 without prejudice;
3. amended claim 19 to delete the recitation of the "confidence level"; and
4. amended claim 27 to delete any reference to a "third party".

Thus, all claims are submitted to comply with the requirements of 35 USC 112.

Section 102 Rejection Based on Merriman

Claims 22-23 stand rejected under 35 USC 102(a) as being anticipated by Merriman et al. (USP 5,948,061). This rejection is respectfully traversed.

Claim 22 has been amended to positively recite the step of collecting geographical information from users of geographically-oriented applets. Merriman does not teach or suggest such a step. Thus, claim 22 (and claim 23 depending therefrom) is submitted to be allowable over Merriman.

Section 103 Rejections Based on Parekh in view of Naidoo

Independent claims 15, 22 and 24 stand rejected under 35 USC 103(a) as being unpatentable over Parekh et al. (USP 6,757,740) in view of Naidoo (USP 6,629,136). This rejection is respectfully traversed.

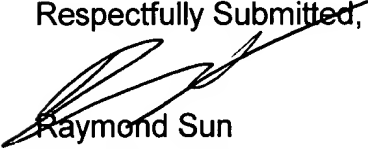
Claims 15, 22 and 24 all recite the use of geographically-oriented applets to collect geographic information that is used to determine the geographic location of the user. Such applets provide a more reliable source for ascertaining the truthfulness (or accuracy) of the geographic information that is collected. In contrast, Parekh is completely silent about the use of geographically-oriented applets to collect geographic information.

The examiner has instead relied on Parekh's disclosure in column 4, lines 62-68 as disclosing the use of any tool to collect geographic information. However, Applicant respectfully submits that this statement does not apply to geographically-oriented applets because such applets were not well-known at the time of Parekh's disclosure. Since the disclosure in a prior art reference cannot encompass embodiments or technology that are not known at the time the disclosure is made, Applicant respectfully submits that Parekh could not have contemplated the use of geographically-oriented applets to collect geographic information.

In light of the above, even a combination of Parekh and Naidoo would not disclose all the limitations of claims 15, 22 and 24, and these claims are submitted to be allowable over Parekh and Naidoo. Claims 16-21, 23 and 25-27 depend from claims 15, 22 and 24, and are submitted to be allowable for the same reasons.

Thus, all pending claims are submitted to be in condition for allowance. However, if the Examiner believes that the claims are not ready to be allowed, the Examiner is encouraged to telephone the undersigned with any suggestions or proposed amendments that might place the application in condition for allowance.

Respectfully Submitted,



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CERTIFICATE OF MAILING

I hereby certify that this paper and its enclosures are being deposited with the United States Postal service as First Class Mail in an envelope addressed to the Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on the date shown below.

Date: March 9, 2007

By: 
Raymond Sun